

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	22-cr-2053 MLG
)	
JOHN LOPEZ,)	
)	
Defendant.)	

UNITED STATES' FIRST AMENDED¹ EXHIBIT LIST

The United States respectfully notifies the Court and counsel of its Exhibit List for trial of this matter. It does not waive its right to supplement this list.

Presiding Judge: Matthew Garcia U.S. District Judge				Plaintiff's Counsel: Frederick T. Mendenhall and Fred Federici		Defendant's Counsel: Joel Meyers, Ahmad Assed, Shah Torgoley, & Britany Schaffer
Trial Date: September 16, 2024				Court Reporter:		Courtroom Deputy/Law Clerk: Evone Romero
Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
1						PMMCO product summary Bates 34019-20
2						John Lopez business card Bates 34017
3						Union Presentation Recording Bates 74442 Entire recording
4						Union Powerpoint presentation Bates 34005-34016
5						James Gonzales PMMCO Contract Bates 8725 - 36
6						James Gonzales PMMCO statement 5.31.2022 & October 31, 2021 Bates 50964, 78498
7						Alan Yaeger PMMCO Contract 45047-45051

¹Changes to this exhibit list from the Doc. 103 are listed below at *.

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
8						John Lopez email to Yaeger Check received 45073-075
9						Lopez to Yaeger Email 1.8.2019 account statement 45093-95
10						Alan Yaeger PMMCO statements Bates 45095, 45127, 44767, 44799, 44823, 44851, 44871, 44897, 44931, 44951, 44977, 45001, 45037, 78491
11						Email from John Lopez Investment Summary Performance Nov. 2018 Bates 45083-85
12						Investment Summary Performance Compilation (Alan Yaeger) Bates 45085, 45091, 45105, 45119, 45123, 45137, 45145, 45151, 44773, 44779, 44793, 44813, 44819, 44829, 44839, 44847, 44859, 44867, 44879, 44905, 44909, 44921, 44925, 44935, 44941, 44947, 44955, 44967, 44973, 44981, 44989, 44987, 45009, 45013
13						Email from John Lopez; subject: Early Warning Alert! 05.27.2019 Bates 45139-45140
14						John Lopez to Phil Apodaca 2.19.2020 introductory email Bates 44663-44666
15						Phil Apodaca PMMCO Contract Bates 07629-38
16						John Lopez to Phil Apodaca email 5.16.20 statement Bates 50745
17						Phil Apodaca PMMCO statements April 30, 2020 – June 30, 2022
18						Bill McCoy recording with John Lopez initial call Bates 74443
19						Bill McCoy video recording meeting with john lopez Bates 74452-62 (combined)
20						Bill McCoy 9.3.2021 call recording with John Lopez Bates 74463
21						Bill McCoy follow up call recording with john lopez Bates 74465

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
22						Bill McCoy PMMCO contract Bates 50045-50051
23						Bill McCoy emails with Account statements Bates 46667-68, 46644-45
24						Bill McCoy recording with John about statements Bates 75544
25						Bill McCoy October recording Bates 74467
26						reserved
27						Robert Archuleta PMMCO contract Bates 07835
28						Robert Archuleta PMMCO statement 5.31.2022 Bates 51043
29						Robert Archuleta Wells Fargo Advisors statements and IRA transfer 45551-45574
30						Joseph Medina PMMCO Contract Bates 29843-49
31						Joseph Medina PMMCO statements Bates 50969
32						reserved
33						Mark Chavez email from Lopez Investment Products 34266-34268
34						Mark Chavez PMMCO contract 30534- 36
35						Mark Chavez PMMCO statements Bates 34263-65, 34258-60, 34281-87
36						Text from John Lopez to Mark Chavez 2.15.2022 Bates 34293
37						Leonard LeRouge PMMCO contract Bates 52257-61
38						Leonard LeRouge PMMCO Statement October 31, 2021 Bates 34414
39						Bernie Gallegos Union Presentation Bates 56127-38
40						Bernie Gallegos Check, receipt, and invoice Bates 56139-41
41						reserved
42						Roger Corrales PMMCO contract Bates 8290-94, 8296-98

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
43						Roger Corrales email from Lopez monthly benefit confirmation Bates 61736-37
44						Roger Corrales PMMCO statement 09.20.21 Bates 61749
45						Anthony Ortiz PMMCO contract Bates 51672 – 51724 (odd #s omitted)
46						Anthony Ortiz PMMCO statements 03.31.22 Bates 50887, 50889-90
47						Tony Duran PMMCO contract Bates 8518-26
48						Tony Duran PMMCO statements Bates 61527-81
49						Martin Martinez PMMCO contract Bates 52329-41 (odd #s omitted)
50						Felix Lopez Intro letter and PMMCO contract Bates 50325-30
51						Felix Lopez PMMCO statement 05.31.0222 Bates 50334
52						Felix Lopez envelope Bates 10836-37
53						Freddie Sanchez PMMCO contract Bates 77125-29
54						Freddie Sanchez Check Bates 77122
55						reserved
56						Frankfort Email to PMMCO 5.5.2015 re: wells fargo discrepancy Bates 48729
57						Lopez to Frankfort email 12.8.2015 Bates 48717
58						Lopez to Frankfort email 1.4.2016 Bates 48712-13
59						Lopez to Frankfort email 1.7.2016 follow-up re:PMMCO Bates 48714
60						Lopez to Frankfort chain 1.4.2016 & 1.7.2016 Bates 48711
61						Lopez to Frankfort 1.10.2016 Bates 48702

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
62						Lopez to Frankfort 1.7.2016 – 1.10.2016 chain Bates 48701
63						Lopez to Frankfort 1.11.2016 email chain Bates 48695-96
64						Lopez & Frankfort email chain 1.10.2016 & 1.11.2016 Bates 48690-91
65						Frankfort 2014-2015 portfolio compared Bates 48762-69
66						Frankfort 2014-2015 portfolio compared Bates 48762-69
67						Lopez email to Frankfort 3.8.2016 Bates 48654
68						Frankfort PMMCO contract Bates 48743-74
69						Frankfort 4.2016 PMMCO statement Bates 48885
70						Frankfort 2 nd quarter Company holdings document Bates 49054-55
71						Frankfort 6.2016 PMMCO quarterly statement with holdings Bates 49056-59
72						Lopez to Frankfort 11.21.2016 email Bates 48532
73						Lopez to Frankfort email chain 8.3.2017-8.4.2017 Bates 48465
74						Lopez email to Frankfort email 2.5.2018 projections Bates 48446
75						Frankfort December 2022 PMMCO statement
76						Lopez email to Frankfort 8.2.2021 Bates 48321
77						Lopez email to Frankfort 8.2.2021 Bates 48303-04
78						Lopez email to Frankfort 9.1.2021 Bates 48287
79						Frankfort 565K check Bates 08591
80						Frankfort PMMCO statement 09.2021 Bates 49049-53

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
81						Frankfort June 2022 statement Bates 50297
82						Balliett PMMCO contract Bates 7927-33
83-89						Reserved
89						Lopez email to Rachel Field 2.10.2014 Bates 34357
90						reserved
91						Rachel Field 03.2014 PMMCO statement Bates 34325
92						Rachel Field 06.2014 PMMCO statement Bates 34362
93-100						Reserved
101						Lopez Year end message email 12.27.2018 Bates 34386
102						Lopez email to Molly Field 12.4.2019 Bates 34387
103-04						reserved
104						Bailey PMMCO contract Bates 74926-31
105						Lopez email chain with Derek Bailey 1.25.2022 – 1.26.2022 Bates 63136
106						Lopez email chain with derek bailey 3.29.2022 Bates 63140
107						Bailey PMMCO statement 04.2022 Bates 63149, 63232
108						Bailey PMMCO statement 05.2022 Bates 63159, 63233
109						Bailey check Bates 74925
110-111						Reserved
112						Lopez 03.17.2022 email commentary Bates 50464-65
113						Reserved Jose Velarde Envelope
114						John Lopez email to jose Velarde 1.25.2021 pmmco statement Bates 50410-12

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
115						Handwritten notes PMMCO statement generation Bates 56377-78
115A						Notes PMMCO statement generation Bates 5144
115B						PMMCO sample statement Bates 5576
116						Handwritten Notes re: David Tackett Bates 5967, 5999, 6010, 6033, 6036, 6046, 6077
117						Handwritten notes re: Discount Gold & Silver Bates 5950, 5959, 5966, 5968, 5971-72, 5982-83, 5994, 5998, 6007, 6010, 6030, 6078
118						Safe invoice Bates 5939
119						Discount gold and silver invoices Business cert Bates 74115 Bates 6923, 6926, 6930-31, 6937-38, 6943, 6947-51, 6957-67, 6978-80, 7019, 7047, 7052, 42799 – 42808, 42810 – 42853, 42855 – 42857
120						AB&C invoices Bates 6714-45, 4973, 53090 – 53114, 53116 -40, 53332 – 53421, 62040 - 43
121						Route 66 invoices and checks Bates 42560 – 84, 51317 – 21, 51324 – 29, 51333-34, 51336-42, 51375, 53377 – 423, 53438-39, 61854-57, 61865, 61868-69, 61871-73, 61886, 61901-05, 62888-93, 63557, 63559-566, 63568
122						Summary chart precious metal invoice tracing
123-125						Reserved
126						OneAZ credit union combined x9999 Bates 43717-20, 43761-72, 56736-773, 56773-56776, 56779-82
126A						One AZ custodian affidavit Bates 56689, 79685
127						Wells Fargo x5813/x8961 statements combined Dec 2013-Aug 2022 Bates 35075-105, 35570-892, 39392-511, 36531-34, 41658-665, 41593-601, 43852-59, 44169-180, 56940-90

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
						Wells Fargo Custodian Affidavits Bates 34775-76, 39378-79, 41591, 41613-14, 43822-23, 44087-88, 44283, 44290, 44279, 56788-89, 61487, 62003
128						reserved
129						Chase statements x0107/5395 combined Bates 44321-77, 50067-118 56465-56550, 61916-62001, 74230- 74280
129A						Chase Custodian Affidavit Bates 40895, 44319, 50068, 56435, 56557, 61907-08 62896, 62905, 74228
130						Coconino federal credit union statements combined x0698 Bates 50286, 50186, 50202, 51233-54
130A						Coconino custodian affidavits Bates 50291-92, 51232
131						Charles Schwab x0451 statements combined 39650-40183 41575-84 57636-45 57656-63 57601-08 57664-71 57622-29
131A						Schwab changes to account Bates 39644-49
131B						Schwab Business Declaration Bates 39645, 41556, 57649
132						Summary Chart – William McCoy tracing
133						Summary Chart – Wells Fargo 5813/8961 tracing 12.13.2013 – 11.08.2021
134						Summary Chart – Wells Fargo 5813/8961 pie charts 12.13.2013- 11.08.2021 additions
135						Summary Chart – Wells Fargo 5813/8961 pie chart subtractions
136						Summary Chart – Wells Fargo 5813/8961 pie chart trading accounts vs. other
137						Summary Chart – various banks 11.09.2021-12.21.2022

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
138						Summary Chart – various banks 11.09.2021-12.21.2022 additions and subtractions
139						Summary Chart – funds paid to investors by year 12.13.2013 – 11.08.2021
140						Summary Chart James Gonzales tracing
141						Summary Chart Mark Chavez tracing
142						Summary Chart Joseph Medina tracing
143						Summary Chart Phil Apodaca tracing
144						Summary Chart James Frankfort tracing
145						Summary Chart Robert Archuleta tracing
146						Summary Chart Keith Lash tracing
147						Summary Chart Molly Field Tracing
148						Summary Chart Ron Jay and Judy Sorrow tracing
149						Summary Chart Rachel Field tracing
150						Summary Chart Tony Duran Tracing
151						Summary Chart Leonard Lerouge
152						Summary Chart Freddie Sanchez
153						Summary Chart Robert Smith
154						Summary Chart Martin Martinez
155						Summary chart Anthony Ortiz
156						Summary Chart Felix Lopez
157						Summary Chart David Rivera
158						Summary Chart Jose Velarde
159						Summary Chart Alan Yaeger
160						Summary Chart Charles Schwab
161						Summary Chart Charles Schwab graph unrealized & realized gains and losses
162						Summary Chart PMMCO purported percent returns compared to gold & silver actual returns 2018
163						Summary Chart PMMCO purported percent returns compared to gold & silver actual returns 2019
164						Summary Chart PMMCO purported percent returns compared to gold & silver actual returns 2020
165						Summary Chart PMMCO purported percent returns compared to gold & silver actual returns 2021
166-69						Reserved

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
170						Summary chart - Precious metals valued November 9, 2021 (date of seizure) Bates 62085 - 62125
171						Summary Chart – Precious metals valued date of March 25, 2022 Bates 62046-62084
172						Summary chart – client balances 10.18.2021
173						Summary chart – client balances 3.31.22 – 5.31.22
174						Summary chart – top five account holders 3.31.22/5.31.22
175						Summary chart – bar graph exhibit 172 compared to exhibit 170
176						Summary chart – bar graph exhibit 174 compared to 171.
177						Lash PMMCO contract and 3.31.2022 statement Bates 51874-79, 50987
178						reserved
179						Robert Smith PMMCO 03.31.22 statement Bates 51047
180						Michael Fritschie PMMCO contract Bates 30973-77
181						Michael Fritchie PMMCO statement May 31, 2022 Bates 51012
182						Frank Lopez PMMCO contract Bates 44590-97
183						Frank Lopez PMMCO statements Bates 50541-50621
184						Felix Martinez PMMCO contract Bates 52068-71
185						Felix Martinez PMMCO 05.31.2022 statement Bates 50950
186						Jessica Madrid recording of John Lopez Bates 78646-48
187						Keith Lash wire transfer Bates 34821
188						Robert Smith wire transfer Bates 34825
189						Anthony Ortiz wire transfer Bates 34842

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
190						Michael Fritchie wire transfer Bates 39612
191						William McCoy wire transfer Bates 41616
192						Judy Sorrow wire transfer \$100,000 Bates 50199
193						Judy Sorrow wire transfer \$60,000 Bates 50205
194						Ron Jay and Judy Sorry wire transfer Bates 50282
195						Alan Yaeger Check Bates 36274
196						Phil Apodaca Check Bates 6590
197						Roger corrales check Bates 8287
198						Tony Duran check Bates 6601-02
199						Felix Lopez check \$340,785.54 Bates 6418
200						Martin Martinez check Bates 6395
201						Felix Lopez check \$186,881.73 Bates 6386
202						Mark Chavez Check Bates 6552
203						Robert Archuleta check Bates 6563
204						Joseph Medina check Bates 44339
205						Freddie Sanchez check Bates 53430
206						Jay Bailey check Bates 62380
207						John Lopez email to Alan Yaeger 1.8.2019 Bates 45093-95
208						John Lopez email to Molly Field 4.4.2019 Bates 34666, 34387-88
209						John Lopez email to Phil Apodaca 5.16.2020 Bates 50745
210						John Lopez email to Jose Velarde 1.25.2021 Bates 50410-12

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
211						John Lopez email to Rachel Field 10.21.2021 Bates 61755, 34345-46
212						John Lopez email to William McCoy 11.3.2021 Bates 46667-68
213						John Lopez email to Jay Bailey 5.5.2022 Bates 63149, 63232
214						John Lopez email to Jay Bailey 6.8.2022 Bates 63159, 63233
215						John Lopez email to James Frankfort 6.9.2022 Bates 50308, 50302-04
216						John Lopez email to Phil Apodaca 7.7.2022 Bates 50650-51
217						Check from Natalia Almeida Bates 62837
218						Check from Jay Bailey signed over to Route 66 Bates 62380, 62833
219						Check from Freddie Sanchez signed over to Route 66 Bates 51357
220						Check from Natalia Almeida signed over to Route 66 Bates 62837, 74283
221						John Lopez email 3.17.2022 major move into precious metals Apodaca Bates 44692-93
222						March Commentary email 3.15.2022 Bates 45039-41
223						Ron Jay and Judy Sorrow PMMCO contract Bates 77996-802
223A						Lopez email to Ron Jay 5.11.2022 Bates 53473-74
223B						Lopez email to Ron Jay 6.14.2022 Bates 53493
224						Ron Jay and Judy Sorrow initial \$150,000 check Bates 44382
225						Lopez Search Warrant interview recorded Bates 34092
226						PMMCO office front door Bates 47485

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
227						PMMCO photograph office 1 Bates 47488
228						PMMCO photograph office 2 Bates 47489
229						PMMCO photograph office 3 Bates 47490
230						PMMCO side room 1 Bates 47494
231						PMMCO side room 2 Bates 47495
232						PMMCO side room 3 Bates 47496
233						PMMCO safe Bates 47497
234						PMMCO silver box Bates 47563
235						PMMCO silver box opened Bates 47567
236						PMMCO SW client folders Bates 47530
237						PMMCO SW client folder 2 Bates 47531
238						PMMCO SW client folders 3 Bates 47511
239						PMMCO SW gold coins Bates 47540
240						PMMCO sw monthly statements Bates 47634
241						PMMCO SW vault empty Bates 47651
242						SW Lopez home exterior Bates 2975
243						SW Lopez home small safe Bates 3017
244						SW Lopez home small safe open Bates 3129
245						SW liberty safe in Lopez home Bates 3102
246						SW champion safe in Lopez home Bates 3104
247						SW liberty safe open Bates 3115
248						SW champion safe open Bates 3113
249						SW photo key to champion safe Bates 3105

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
250						SW gold coins evidence 4 Bates 3144
251						SW gold evidence 7 Bates 3156
252						SW silver box 10 Bates 3162
253						SW silver box 10 open Bates 3163
254						SW Canadian silver box 16 Bates 3182
255						SW Canadian silver box 16 open Bates 3184
256						SW silver and gold bars Bates 3591
257						SW AB&C bag Bates 3329
258						SW AB&C invoice in house Bates 3617
259						SW liberty safe empty Bates 3327
260						SW champion safe empty
261						SW storage unit closed door
262						SW storage unit open door
263						SW storage unit open close
264						SW storage unit w silver boxes
265						SW storage unit evidence 1
266						SW storage unit evidence 1 box
267						SW storage unit evidence 1 open
268						SW storage unit evidence 59
269						SW storage unit evidence 59 open
270						SW storage unit exit photo
271						Gaston and Sheehan photo of bullion
272						Gaston and Sheehan gold bar photo
273						Gaston and Sheehan gold coin photo
274						Gaston and Sheehan gold coins 2
275						1 monster box of Silver seized (Physical evidence)
276						10/21 Client information document Bates 4951-68
277						PMMCO client investment summary 2017 Bates 51396 -51405
278						John Lopez email to discount gold and silver 9.12.2018 Bates 43176

Plf. No.	Def. Ltr.	Objection	Admitted	Date Offered	Witness	Description of Exhibit
279						John Lopez email to discount gold and silver 3.21.2020 Bates 43373-74

*The following changes have been made to this exhibit list since the initially filed exhibit list:

Exhibit 3 – amended citation to entire recording

Exhibit 10 – bates updated

Exhibit 75 – amended to just Frankfort December 2022 PMMCO statement.

Exhibit 93 – amended to reserved

Exhibit 100 – amended to reserved

Exhibit 113 – bates omitted, delivered by email to defense

Exhibit 119 – business cert added

Exhibit 126 – bates updated

Exhibit 126A – bates updated

Exhibit 129 – bates updated

Exhibit 129A – bates updated

Exhibit 131 – bates updated

Exhibit 153 – amended to summary chart for Robert Smith

Exhibit 178 – amended to reserved

Exhibit 186—bates updated

Exhibit 222 – amended to March commentary email 3.15.2022

Exhibits 280-291 – removed.

The United States will amend this list if it identifies additional evidence that may be offered during the government’s case-in-chief.

Respectfully submitted this 11th day of September, 2024.

ALEXANDER M.M. UBALLEZ
United States Attorney

/s/ Filed Electronically
Frederick T. Mendenhall
Fred Federici
Assistant United States Attorneys
P.O. Box 607
Albuquerque, New Mexico 87103
(505) 346-7274

I HEREBY CERTIFY that on September 11, 2024,
I filed the foregoing electronically through the
CM/ECF system, which caused all counsel of
record to be served by electronic means, as more
fully reflected on the Notice of Electronic Filing.

/s/ Filed Electronically
Frederick T. Mendenhall
Assistant U.S. Attorney